

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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IRVING H. PICARD, Trustee for the Liquidation	:	11 Civ. 8018 (JSR)
of Bernard L. Madoff Investment Securities,	:	
L.L.C.,	:	(Adv. Pro. No. 10-05415)
	:	
Plaintiff,	:	
	:	
against	:	
	:	
AMERICAN SECURITIES MANAGEMENT,	:	
L.P., formerly known as AMERICAN	:	
SECURITIES, L.P., et al.,	:	
	:	
Defendants.	:	
	:	
	:	
	:	
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**JOINDER IN THE MOVING DEFENDANTS' MOTION
TO WITHDRAW THE REFERENCE FILED NOVEMBER 7, 2011**

Neil B. Goldstein, Joyce W. Goldstein, Neil B. Goldstein IRA Rollover, Joyce W. Goldstein IRA, Laurence Ach, Darmel Management, L.L.C., and South Lake, L.L.C., defendants in the above-referenced adversary proceeding, by and through their undersigned counsel, hereby respectfully join in the Motion to Withdraw the Bankruptcy Reference filed on November 7, 2011, by Korenstein Veisz Wexler & Pollard LLP on behalf of the parties designated therein as "the Moving Defendants."

Dated: New York, New York
February 29, 2012

PROSKAUER ROSE LLP

By: /s Richard L. Spinogatti
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Attorneys for Defendants
Neil B. Goldstein, individually, as
beneficial owner of one or more IRAs, as
grantor of the Neil B. Goldstein 2007 Trust,
and as beneficiary of the Jean Weiner 1991
Grantor Retained Annuity Trust;
Joyce W. Goldstein, individually, as
beneficial owner of an IRA, and as trustee of
the Neil B. Goldstein 2007 Trust;
Neil B. Goldstein IRA Rollover;
Joyce W. Goldstein IRA;
Laurence Ach, as trustee of the Jean Weiner
1991 Grantor Retained Annuity Trust;
Darmel Management, L.L.C.; and
South Lake, L.L.C.